

**UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                          |   |                               |
|--------------------------|---|-------------------------------|
| FRANK BANDAS             | ) |                               |
|                          | ) |                               |
| PLAINTIFF,               | ) | Civil Action No. 17-cv-00987  |
|                          | ) |                               |
| v.                       | ) | Hon. Samuel Der-Yeghiayan     |
|                          | ) |                               |
| NATIONWIDE CREDIT, INC., | ) | Magistrate Judge Young B. Kim |
|                          | ) |                               |
| DEFENDANT.               | ) |                               |

**PLAINTIFF’S MOTION FOR DEFAULT ORDER**

NOW COMES the Plaintiff, Frank Bandas, by and through his attorneys, and hereby moves this Court to hold the Defendant, Nationwide Credit Inc. in default. In support of this Motion, Plaintiff states as follows:

1. Plaintiff filed his First Amended Complaint on February 14, 2017. (Dkt.#5).
2. The Defendant was served with process on February 27, 2017, and their responsive pleading was due March 20, 2017. (Dkt. #7).
3. Defendant has failed to timely answer or otherwise plead.
4. Plaintiff thus asks that this Court Enter an Order of Default as to Defendant, Nationwide Credit, Inc. pursuant to Fed. R.Civ. P. 55(a) and to set this matter for a future date for entry of default judgment and prove-up.

WHEREFORE, Plaintiff Frank Bandas, by and through his attorneys, moves this Honorable Court to enter default at to Defendant, Nationwide Credit, Inc., and for any other relief this Court deems just.

Respectfully Submitted,  
/s/ Celetha C. Chatman  
Celetha Chatman

Celetha Chatman  
Attorney at Law  
Community Lawyers Group, Ltd.  
73 W. Monroe, Suite 514  
Chicago, IL 60603  
Ph: 312.757.1880  
fax: 312.476.1383  
[cchatman@communitylawyersgroup.com](mailto:cchatman@communitylawyersgroup.com)

**UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                          |   |                               |
|--------------------------|---|-------------------------------|
| FRANK BANDAS             | ) |                               |
|                          | ) |                               |
| PLAINTIFF,               | ) | Civil Action No. 17-cv-00987  |
|                          | ) |                               |
| v.                       | ) | Hon. Samuel Der-Yeghiayan     |
|                          | ) |                               |
| NATIONWIDE CREDIT, INC., | ) | Magistrate Judge Young B. Kim |
|                          | ) |                               |
| DEFENDANT.               | ) |                               |

**CERTIFICATE OF SERVICE**

I, Celetha C. Chatman, an attorney, certify that I shall cause to be served a copy of the **Plaintiff's Notice of Motion For Default Order & Motion For Default Order** upon the following individual(s), as indicated below, this day of March 31, 2017, along with a certified copy of the notice of motion entered in the case referenced above:

|   |   |
|---|---|
| <input type="checkbox"/> CM/ECF               | Nationwide Credit, Inc.<br>c/o Prentice Hall Corporation<br>222 S. Riverside Plaza, Suite 2310<br>Chicago, Illinois 60606 |
| <input type="checkbox"/> Facsimile            |   |
| <input type="checkbox"/> Federal Express      |   |
| <input type="checkbox"/> UPS                  |   |
| <input checked="" type="checkbox"/> USPS Mail |   |
| <input type="checkbox"/> Messenger            |   |
| <input type="checkbox"/> Email                |   |

By: /s/Celetha C. Chatman  
Attorney for Plaintiff

Celetha Chatman  
Michael Wood  
***Community Lawyers Group, Ltd.***  
73 W. Monroe Street, Suite 514  
Chicago, IL 60603  
(312)757-1880  
cchatman@communitylawyersgroup.com  
mwood@communitylawyersgroup.com